



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

SLR:KAN:JHK

610 Federal Plaza, 5th Floor

Central Islip, New York 11722

October 15, 2010

VIA ELECTRONIC FILING

Kenneth W. Ravenell, Esq.
The Murphy Firm
One south Street, 23rd Floor
Baltimore, Maryland 21202

Re: United States v. Brooks, et al.
Criminal Action No. 06 CR 0550 (S-1) (Seybert, J.)

Dear Mr. Ravenell:

This undersigned Assistant United States Attorneys represent the United States with respect to the forfeiture issues in the above prosecution against defendants Sandra Hatfield ("Hatfield") and David H. Brooks ("Brooks"). This letter is submitted in response to Brooks' letters dated October 9 and October 11, 2010, seeking limited additional discovery concerning the work performed by Professor Larry Harris in this case. See Docket Entry Nos. 1353 and 1354.

First, please be advised that Professor Harris has no disqualifying conflict so as to preclude his testimony in the forfeiture phase of this case. Contrary to Brooks' surmise, the government did not engage or retain Charles River Associates ("CRA") in connection with this case. CRA personnel did not conduct any analyses or perform any services for either the government or Professor Harris in connection with this case. Thus, Professor Harris did not submit any bills or invoices to CRA, and the government did not pay to any fees to CRA, in connection with this case. Therefore, the bulk of the limited discovery Brooks requested does not exist.

The government did, however, retain National Economic Research Associates, Inc. ("NERA"). NERA worked with Professor

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Harris in preparation for his expert testimony and provided other services to the government unrelated to Professor Harris' analysis and testimony. Without waiving any privilege, the government will produce copies of its engagement letters and the invoices submitted under separate cover.

Very truly yours,

LORETTA E. LYNCH
United States Attorney

By: s/ James H. Knapp
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To: **Via ECF**

Honorable Joanna Seybert
United States District Judge
Eastern District of New York

Roland Riopelle, Esq.
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